|   | UNITED STATE  | ES DIS       | STRICT COURT                                       |  |                              |
|---|---|--------------|--|--|------------------------------|
|   | Cauthama  | for the      | fobia 🗔  |  |                              |
| Richard   |   | District o   | i Onio   |  |                              |
| Plair<br>V  | ntiff   | )            | Civil Action No. 2:23-                             | -cv-3888                                     |                              |
| City of Colur   | mbus, et al.  | )            |  |  |                              |
| Defen   | dant  | )            |  |  |                              |
|   | ENA TO PRODUCE DOC<br>O PERMIT INSPECTION   |              |  |  |                              |
| То:   |   |              | go, University Counsel<br>Street, Chicago, IL, 606 | 312  |                              |
|   | (Name of persor   | to whom th   | is subpoena is directed)                           |  |                              |
| documents, electronically s<br>material:<br>See Exhibit A | ARE COMMANDED to protored information, or objects   | s, and to p  | ermit inspection, copyir                           | ng, testing, or sam                          | pling of the                 |
| Place:  | 8 1-1   |              | Date and Time:                                     |  |                              |
| Place:<br>City of Columbus, D<br>77 N. Front Street, G    | ept. of Law<br>Columbus, OH 43215   |              | 09/06/2024 at 9:0                                  | 00 a.m.                                      |                              |
| other property possessed or                               | ises: YOU ARE COMMA! controlled by you at the timey, photograph, test, or sam             | ne, date, ar | nd location set forth belo                         | ow, so that the requ                         | uesting party                |
| Place:  |   |              | Date and Time:                                     |  |                              |
|   |   |              |  |  |                              |
| Rule 45(d), relating to your                              | visions of Fed. R. Civ. P. 45<br>protection as a person subject the potential consequence | ect to a su  | bpoena; and Rule 45(e)                             | g to the place of co<br>and (g), relating to | ompliance;<br>o your duty to |
|   | CLERK OF COURT  |              | OR SH  | Dias   |                              |
| -   | Signature of Clerk or Depu  | uty Clerk    |  | Attorney's signature                         | ?                            |
| The name, address, e-mail                                 | address, and telephone num  | ber of the   | attorney representing (n                           | ame of party)                                |                              |
| Brenda Walker and City of G                               |   |              |  | requests this sub                            | poena, are:                  |
| David Dirisamer, Assistant                                | City Attorney, 77 N. Front S  | treet, Colu  |  |  |                              |

Notice to the person who issues or requests this subpoena

614-645-6964

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| on (date, | •  | ena for (name of individual and title, if any                             |  |                     |
|-----------|--|---|--|---------------------|
|           | ☐ I served the subpo                       | ena by delivering a copy to the nam                                       | ed person as follows:  |                     |
|           |  |   | on (date)  | or                  |
|           |  | poena unexecuted because:   |  |                     |
|           | Unless the subpoena tendered to the witner | was issued on behalf of the United ess the fees for one day's attendance, | States, or one of its officers or agents, I and the mileage allowed by law, in the | have also amount of |
|           | \$   | ·   |  |                     |
| My fee    | es are \$                                  | for travel and \$   | for services, for a total of \$  | 0.00                |
|           | I declare under pena                       | lty of perjury that this information is                                   | true.  |                     |
| Date:     |  |   | Server's signature   |                     |
|           |  | -   | Printed name and title   |                     |
|           |  |   |  |                     |

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

## (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between the University of Illinois Chicago, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the University of Illinois Chicago on October 30, 2023 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from the University of Illinois Chicago, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the University of Illinois Chicago on October 30, 2023 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the University of Illinois Chicago on October 30, 2023 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the University of Illinois Chicago on October 30, 2023 or at any time on or after January 1, 2022.

# United States District Court

for the

Southern District of Ohio

|  | Southern District of  | of Ohio   |
|--|---|---|
|  | ARD HORTON,  Plaintiff  v.  Columbus, et al.  | Civil Action No. 2:23-cv-3888   |
|  | Defendant )   |   |
|  | BPOENA TO PRODUCE DOCUMENT<br>OR TO PERMIT INSPECTION OF PR   |   |
| To:                                    | University of Cincinnati, A<br>University Hall, 51 Goodman D  | Drive, Cincinnati, OH 45221   |
|  | (Name of person to whom the   | his subpoena is directed)   |
| material: Any and all do or reimbursem | ocuments including, but not limited to, documents related to Richard Horton or Janette Horton or Pling events to be held at or in conjunction with the Ob | the time, date, and place set forth below the following permit inspection, copying, testing, or sampling of the flecting communications, contracts or agreements, or payments Pierce Reed or the Ohio Innocence Project in relation to Richard hio State University on October 1, 2024 or at any time on or after |
| Place: City Attorney                   |   | Date and Time:  |
| 77 N. Front St                         | treet, Columbus, Ohio 43215   | 10/25/2024 12:00 pm   |
|  |   | operty or any designated object or operation on it.  Date and Time:   |
| Rule 45(d), relating to                |   | ned – Rule 45(c), relating to the place of compliance; abpoena; and Rule 45(e) and (g), relating to your duty to doing so.  |
|  | CLERV OF COURT  |   |
|  | CLERK OF COURT  | OR  |
|  |   | /s/ David J. Dirisamer  |
|  | Signature of Clerk or Deputy Clerk  | Attorney's signature  |
|  |   |   |
|  | nail address, and telephone number of the   |   |
| The City of Columbus a                 |   | , who issues or requests this subpoena, are:  |
| David J. Dirisamer, As                 | sistant City Attorney, 77 N. Front Street, C  | Columbus OH 43215, (614) 645-6964   |

## Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| 1 (date)          | bpoena for (name of individual and title, if an                                   |                                 |      |
|-------------------|---|---------------------------------|------|
| ☐ I served the su | ubpoena by delivering a copy to the nar   | ned person as follows:          |      |
|                   |   | on (date)                       | ; or |
| ☐ I returned the  | subpoena unexecuted because:  |                                 |      |
|                   | vena was issued on behalf of the United vitness the fees for one day's attendance |                                 |      |
| y fees are \$     | for travel and \$   | for services, for a total of \$ | 0.00 |
| I declare under p | enalty of perjury that this information i   | s true.                         |      |
| te:               |   | Server's signature              |      |
|                   |   | Printed name and title          |      |
|                   |   |                                 |      |
|                   |   | Server's address                |      |

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

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  - **(B)** inspection of premises at the premises to be inspected.

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  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
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- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
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- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# United States District Court

for the

Southern District of Ohio

| 5001   | them District of Onlo   |
|--|---|
| RICHARD HORTON,  Plaintiff  v.   | ) ) Civil Action No. 2:23-cv-3888   |
| City of Columbus, et al.   | )<br>)  |
| Defendant  | )   |
|  | OOCUMENTS, INFORMATION, OR OBJECTS<br>FION OF PREMISES IN A CIVIL ACTION  |
| To: 2801 W   | University of Toledo<br>. Bancroft St., Toledo, OH 43606  |
| (Name of p   | person to whom this subpoena is directed)   |
| material: Any and all documents including, but not limited or reimbursements related to Richard Horton or Ja | to produce at the time, date, and place set forth below the following bjects, and to permit inspection, copying, testing, or sampling of the to, documents reflecting communications, contracts or agreements, or payments mette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard action with The University of Toledo since January 1, 2022. |
| Place: City Attorney's Office  | Date and Time:  |
| 77 N. Front Street, Columbus, Ohio 43215   | 01/27/2025 12:00 pm   |
| other property possessed or controlled by you at th  | MANDED to permit entry onto the designated premises, land, or e time, date, and location set forth below, so that the requesting party sample the property or any designated object or operation on it.  Date and Time:   |
|  |   |
| Rule 45(d), relating to your protection as a person respond to this subpoena and the potential consequ       | . 45 are attached – Rule 45(c), relating to the place of compliance; subject to a subpoena; and Rule 45(e) and (g), relating to your duty to ences of not doing so.   |
| Date:01/07/2025  |   |
| CLERK OF COURT   |   |
|  | OR  |
| <del></del>  | /s/ David J. Dirisamer  |
| Signature of Clerk or  | Deputy Clerk Attorney's signature   |
| The name, address, e-mail address, and telephone r   | number of the attorney representing (name of party)   |
| The City of Columbus and Brenda Walker   | , who issues or requests this subpoena, are:  |
|  |   |
| David J. Dirisamer, Assistant City Attorney, 77 N. F   | ront Street, Columbus OH 43215, (614) 645-6964  |

# Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

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| 1 (date)          | bpoena for (name of individual and title, if an                                   |                                 |      |
|-------------------|---|---------------------------------|------|
| ☐ I served the su | ubpoena by delivering a copy to the nar   | ned person as follows:          |      |
|                   |   | on (date)                       | ; or |
| ☐ I returned the  | subpoena unexecuted because:  |                                 |      |
|                   | vena was issued on behalf of the United vitness the fees for one day's attendance |                                 |      |
| y fees are \$     | for travel and \$   | for services, for a total of \$ | 0.00 |
| I declare under p | enalty of perjury that this information i   | s true.                         |      |
| te:               |   | Server's signature              |      |
|                   |   | Printed name and title          |      |
|                   |   |                                 |      |
|                   |   | Server's address                |      |

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### (g) Contempt.

# United States District Court

for the

| Southern District of  | of Ohio   |
|---|---|
| RICHARD HORTON,  Plaintiff )  |   |
| v. )  | Civil Action No. 2:23-cv-3888   |
| City of Columbus, et al.  |   |
| ) Defendant )   |   |
| SUBPOENA TO PRODUCE DOCUMENTS<br>OR TO PERMIT INSPECTION OF PRI   |   |
| OR TO PERMIT INSPECTION OF PRI  | EMISES IN A CIVIL ACTION  |
| To: University of Dayton, St. Joseph Hall, Room 436, 300 Col  |   |
| (Name of person to whom th  | is subpoena is directed)  |
| Production: YOU ARE COMMANDED to produce at t documents, electronically stored information, or objects, and to p  | he time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the |
| material: Any and all documents including, but not limited to, documents reflor reimbursements related to Richard Horton or Janette Horton or Pi Horton concerning an event held on or about 10/21/24, or any other The University of Dayton. | erce Reed or the Ohio Innocence Project in relation to Richard  |
| Place: City Attorney's Office   | Date and Time:  |
| 77 N. Front Street, Columbus, Ohio 43215  |   |
| , , ,   | 01/27/2025 12:00 pm   |
| ☐ Inspection of Premises: YOU ARE COMMANDED to pother property possessed or controlled by you at the time, date, ar may inspect, measure, survey, photograph, test, or sample the proplace:   | nd location set forth below, so that the requesting party   |
|   |   |
| The following provisions of Fed. R. Civ. P. 45 are attached Rule 45(d), relating to your protection as a person subject to a subgrespond to this subpoena and the potential consequences of not do Date:                                      | opoena; and Rule 45(e) and (g), relating to your duty to  |
| CLERK OF COURT  |   |
|   | OR  |
|   | /s/ David J. Dirisamer  |
| Signature of Clerk or Deputy Clerk  | Attorney's signature  |
| The name, address, e-mail address, and telephone number of the  | attorney representing (name of party)   |
| The City of Columbus and Brenda Walker  | , who issues or requests this subpoena, are:  |
| David J. Dirisamer, Assistant City Attorney, 77 N. Front Street, Co   | <u> </u>  |

# Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| 1 (date)          | bpoena for (name of individual and title, if an                                   |                                 |      |
|-------------------|---|---------------------------------|------|
| ☐ I served the su | ubpoena by delivering a copy to the nar   | ned person as follows:          |      |
|                   |   | on (date)                       | ; or |
| ☐ I returned the  | subpoena unexecuted because:  |                                 |      |
|                   | vena was issued on behalf of the United vitness the fees for one day's attendance |                                 |      |
| y fees are \$     | for travel and \$   | for services, for a total of \$ | 0.00 |
| I declare under p | enalty of perjury that this information i   | s true.                         |      |
| te:               |   | Server's signature              |      |
|                   |   | Printed name and title          |      |
|                   |   |                                 |      |
|                   |   | Server's address                |      |

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - **(B)** inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# United States District Court

for the

Southern District of Ohio

| RICHARD HORTON,  |   |
|--|---|
| Plaintiff )  | Civil Action No. 2:23-cv-3888   |
| v. ) City of Columbus, et al. )  | Civil Action No. 2.23-cv-3000   |
| <u> </u>   |   |
| Defendant )  |   |
| SUBPOENA TO PRODUCE DOCUMEN<br>OR TO PERMIT INSPECTION OF I  |   |
|  | for Law, Justice & Culture<br>niversity, Athens, OH 45701   |
| (Name of person to whom  | m this subpoena is directed)  |
| Production: YOU ARE COMMANDED to produce documents, electronically stored information, or objects, and to material:  See Exhibit A   | at the time, date, and place set forth below the following to permit inspection, copying, testing, or sampling of the |
| See Exhibit A  |   |
| Place: City Attorney's Office  | Date and Time:  |
| 77 N. Front Street, Columbus, Ohio 43215   | 10/30/2024 12:00 pm   |
| ☐ Inspection of Premises: YOU ARE COMMANDED other property possessed or controlled by you at the time, date may inspect, measure, survey, photograph, test, or sample the Place: | e, and location set forth below, so that the requesting party   |
| Trace.   | Date and Time.  |
|  |   |
| Rule 45(d), relating to your protection as a person subject to a respond to this subpoena and the potential consequences of no   |   |
| Date:10/10/2024  |   |
| CLERK OF COURT   |   |
|  | OR<br>/s/ David J. Dirisamer  |
| Signature of Clerk or Deputy Clerk   | Attorney's signature  |
| The name address a mail address and talanhans assurb as fel-   | he attempty representing (  |
| The name, address, e-mail address, and telephone number of the City of Columbus and Brenda Walker  | , who issues or requests this subpoena, are:  |
| THE SILVER OF SOUTHINGS AND DIGHTED VAILED   |   |

# Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| I received this so | ubpoena for (name of individual and title, if an | ny)   |      |
|--------------------|--|---|------|
| ·                  | ·  |   |      |
| ☐ I served the s   | subpoena by delivering a copy to the nar         | med person as follows:  |      |
|                    |  | on (date) ;   | or   |
| ☐ I returned the   | e subpoena unexecuted because:                   |   |      |
|                    |  | States, or one of its officers or agents, I e, and the mileage allowed by law, in the |      |
| fees are \$        | for travel and \$                                | for services, for a total of \$   | 0.00 |
| I declare under j  | penalty of perjury that this information i       | s true.   |      |
| :                  |  | Server's signature  |      |
|                    |  | server's signature  |      |
|                    |  | Printed name and title  |      |
|                    |  |   |      |
|                    |  | Server's address  |      |

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - **(B)** inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

#### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

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- (1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:
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- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between Ohio University, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Ohio University on October 8, 2024 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from Ohio University, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Ohio University on October 8, 2024 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Ohio University on October 8, 2024 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Ohio University on October 8, 2024 or at any time on or after January 1, 2022.

# United States District Court

for the

|  | Southern District of   | Ohio  |   |
|--|--|---|---|
| RICHARD HORTON,  Plaintiff  v.  City of Columbus, et al.   | )  | Civil Action No.                                | 2:23-cv-3888  |
| Defendant  | )  |   |   |
|  | DUCE DOCUMENTS,<br>INSPECTION OF PRE                               |   |   |
|  | e University, Office of Leo<br>N. High Street, Suite 500           |   |   |
|  | (Name of person to whom this                                       | s subpoena is directed                          | )   |
|  | not limited to, documents refle<br>forton or Janette Horton or Pie | ecting communications<br>rce Reed or the Ohio I | , contracts or agreements, or payments nnocence Project in relation to Richard October 1, 2024 or at any time on or after |
| Place: City Attorney's Office  |  | Date and Time:                                  |   |
| 77 N. Front Street, Columbus, Oh   | nio 43215  | 10  | 0/25/2024 12:00 pm  |
| ☐ Inspection of Premises: YOU AR other property possessed or controlled by may inspect, measure, survey, photograph  Place:              | you at the time, date, and   | d location set forth                            | below, so that the requesting party   |
|  |  |   |   |
| The following provisions of Fed. Rule 45(d), relating to your protection as a respond to this subpoena and the potential Date:10/03/2024 | a person subject to a subj   | poena; and Rule 4                               |   |
| CLERK OF CO  | OURT   |   |   |
|  |  | OR  | /s/De til I Ditterne  |
| Signature o  | of Clerk or Deputy Clerk   |   | /s/ David J. Dirisamer  Attorney's signature  |
|  | ,  |   | ,   |
| The name, address, e-mail address, and te  | lephone number of the at   | torney representir                              | ng (name of party)  |
| The City of Columbus and Brenda Walker   |  | , who issue                                     | es or requests this subpoena, are:  |
| David I Dirigamer Assistant City Attorne   | v 77 N Front Street Co   | lumbus OH 43215                                 | (614) 645-6964  |

# Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| (date)            | ibpoena for (name of individual and title, if an | <i></i>   |      |
|-------------------|--|---|------|
| ☐ I served the s  | ubpoena by delivering a copy to the nar          | med person as follows:  |      |
|                   |  | on (date) ;   | or   |
| ☐ I returned the  | subpoena unexecuted because:                     |   |      |
|                   |  | States, or one of its officers or agents, I e, and the mileage allowed by law, in the |      |
| fees are \$       | for travel and \$                                | for services, for a total of \$   | 0.00 |
| I declare under p | penalty of perjury that this information i       | s true.   |      |
| <b>:</b> :        |  | Server's signature  |      |
|                   |  | Printed name and title  |      |
|                   |  |   |      |
|                   |  | Server's address  |      |

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

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- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
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- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
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### (g) Contempt.

| UNITED STATES DIST   | TRICT COURT   |
|--|---|
| Southern District of G   | Ohio 🔻  |
| Richard Horton   |   |
| Plaintiff )  v. )  City of Columbus, et al.  | Civil Action No. 2:23-cv-3888                           |
| Defendant )  |   |
| SUBPOENA TO PRODUCE DOCUMENTS, I<br>OR TO PERMIT INSPECTION OF PREM  |   |
| To: Miami University, Office of 215 Roudebush Hall, 501 E. High  | General Counsel<br>Street, Oxford, OH 45056             |
| (Name of person to whom this production: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to permaterial:  See Exhibit A  | e time, date, and place set forth below the following   |
| GG 2AIIGH 7  |   |
| Place: City of Columbus, Dept. of Law 77 N. Front Street, Columbus, OH 43215   | Date and Time: 09/06/2024 at 9:00 a.m.                  |
| ☐ Inspection of Premises: YOU ARE COMMANDED to perform other property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property.                  | location set forth below, so that the requesting party  |
| Place:   | Date and Time:  |
| The following provisions of Fed. R. Civ. P. 45 are attached Rule 45(d), relating to your protection as a person subject to a subprespond to this subpoena and the potential consequences of not doi  Date:08/19/2024 | poena; and Rule 45(e) and (g), relating to your duty to |
| CLERK OF COURT  Signature of Clerk or Deputy Clerk   | OR Sul Signature  |
| The name, address, e-mail address, and telephone number of the at Brenda Walker and City of Columbus  David Dirisamer, Assistant City Attorney, 77 N. Front Street, Columbus   | , who issues or requests this subpoena, are:            |

Notice to the person who issues or requests this subpoena

614-645-6964

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| on (date) | I received this subpoena for (name of individual and title, if any)  I served the subpoena by delivering a copy to the named person as follows:  |                                     |                                 |      |  |  |
|-----------|--|-------------------------------------|---------------------------------|------|--|--|
|           |  |                                     |                                 |      |  |  |
| -         |  |                                     | on (date)                       | or   |  |  |
|           | ☐ I returned the subpoo  | ena unexecuted because:             |                                 |      |  |  |
| -         | Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of |                                     |                                 |      |  |  |
|           | \$   | · ·                                 |                                 |      |  |  |
| My fees   | s are \$   | for travel and \$                   | for services, for a total of \$ | 0.00 |  |  |
|           | I declare under penalty  | of perjury that this information is | s true.                         |      |  |  |
| Date:     |  |                                     | Server's signature              |      |  |  |
|           |  |                                     | Printed name and title          |      |  |  |
|           |  |                                     | Server's address                |      |  |  |

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

## (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

# (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between Miami University, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Miami University on November 15, 2023 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from Miami University, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Miami University on November 15, 2023 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Miami University on November 15, 2023 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Miami University on November 15, 2023 or at any time on or after January 1, 2022.

| UNITED STATES DI  | STRICT COURT  |
|---|---|
| Southern District   | of Ohio   |
| Richard Horton  |   |
| Plaintiff ) v. )  | Civil Action No. 2:23-cv-3888   |
| City of Columbus, et al.  |   |
| Defendant )   |   |
| SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF PR  | S, INFORMATION, OR OBJECTS<br>LEMISES IN A CIVIL ACTION   |
| To: Judah Christian Community Church or 972 Beechwood Road,   | Judah Christian Community Center<br>Columbus, OH 43227  |
| (Name of person to whom   | his subpoena is directed)   |
| Production: YOU ARE COMMANDED to produce at documents, electronically stored information, or objects, and to material:  See Exhibit A   | permit inspection, copying, testing, or sampling of the   |
| Place:  | Date and Time:  |
| Place: City of Columbus, Dept. of Law 77 N. Front Street, Columbus, OH 43215  | 09/06/2024 at 9:00 a.m.   |
| ☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the p                   | end location set forth below, so that the requesting party coperty or any designated object or operation on it. |
| Place:  | Date and Time:  |
| The following provisions of Fed. R. Civ. P. 45 are attack Rule 45(d), relating to your protection as a person subject to a strespond to this subpoena and the potential consequences of not Date: | ubpoena; and Rule 45(e) and (g), relating to your duty to   |
| CLERK OF COURT  | OR Sal Sie  |
| Signature of Clerk or Deputy Clerk  | Attorney's signature  |
| The name, address, e-mail address, and telephone number of th   | e attorney representing (name of party)   |
| Brenda Walker and City of Columbus  David Dirisamer, Assistant City Attorney, 77 N. Front Street, Co.   | , who issues or requests this subpoena, are: lumbus, OH 43215; djdirisamer@columbus.gov;                        |
| 614-645-6964  |   |

Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| Ir        | received this subpoena for (r  | name of individual and title, if any) |                                 |      |  |  |
|-----------|--|---------------------------------------|---------------------------------|------|--|--|
| on (date) | · · · · · · · · · · · · · · · · · · ·  |                                       |                                 |      |  |  |
| 0         | ☐ I served the subpoena by delivering a copy to the named person as follows:   |                                       |                                 |      |  |  |
| _         | on (date) ; or   |                                       |                                 |      |  |  |
| 0         | ☐ I returned the subpoena unexecuted because:  |                                       |                                 |      |  |  |
| U<br>te   | Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of |                                       |                                 |      |  |  |
| \$        |  |                                       |                                 |      |  |  |
| My fees a | re \$  | for travel and \$                     | for services, for a total of \$ | 0.00 |  |  |
| I         | declare under penalty of per   | rjury that this information is true.  |                                 |      |  |  |
| Date:     |  |                                       | Server's signature              |      |  |  |
|           |  |                                       | Printed name and title          |      |  |  |
|           |  |                                       |                                 |      |  |  |
|           |  |                                       | Server's address                |      |  |  |

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

## (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

# (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between the Judah Christian Community Church or Judah Christian Community Center, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Judah Christian Community Church or Judah Christian Community Center on October 15, 2023 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from the Judah Christian Community Church or Judah Christian Community Center, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Judah Christian Community Church or Judah Christian Community Center on October 15, 2023 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Judah Christian Community Church or Judah Christian Community Center on October 15, 2023 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Judah Christian Community Church or Judah Christian Community Center on October 15, 2023 or at any time on or after January 1, 2022.

|   | UNITED STAT   | TES DIS                       | TRICT COURT  |
|---|---|-------------------------------|--|
|   |   | for the                       | от. П  |
|   |   | rn District of                | Ohio   |
| *************************************** | Richard Horton  Plaintiff  V.   | _ )                           | Civil Action No. 2:23-cv-3888  |
|   | City of Columbus, et al.  | )                             |  |
|   | Defendant   | - }                           |  |
|   | SUBPOENA TO PRODUCE DO<br>OR TO PERMIT INSPECTION   |                               |  |
| To:                                     |   |                               | resident for Finance and Administration iffin, OH 44883  |
|   | (Name of pers   | on to whom this               | s subpoena is directed)  |
| document<br>material:                   | is, electronically stored information, or objective Exhibit A   | produce at the cts, and to pe | the time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the   |
| Place:                                  | to of Columbus Doot of Law  |                               | Date and Time:   |
|   | ty of Columbus, Dept. of Law<br>'N. Front Street, Columbus, OH 43215                                    |                               | 09/06/2024 at 9:00 a.m.  |
| other proj                              | perty possessed or controlled by you at the ti  | ime, date, and                | ermit entry onto the designated premises, land, or d location set forth below, so that the requesting party perty or any designated object or operation on it. |
| Place:                                  |   |                               | Date and Time:   |
| Rule 45(0                               | d), relating to your protection as a person subsorbits subpoena and the potential consequent 08/19/2024 | bject to a sub                | ed – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so.  |
|   | CLERK OF COURT  Signature of Clerk or De  | eputy Clerk                   | OR Sul Le Attorney's signature   |
| The name                                | e, address, e-mail address, and telephone nu  |                               | attorney representing (name of party)  |
|   | e, address, e-mail address, and telephone null  | moer of the a                 | , who issues or requests this subpoena, are:   |
| David Dir<br>614-645-                   | isamer, Assistant City Attorney, 77 N. Front  | Street, Colur                 | mbus, OH 43215; djdirisamer@columbus.gov;  |

Notice to the person who issues or requests this subpoena

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

| 10-200-00-110-00 (200-00-00-00-00-00-00-00-00-00-00-00-00- | poena for (name of individual and title, if any                                |   |                        |  |  |
|--|--|---|------------------------|--|--|
| (date)   | _'   |   |                        |  |  |
| ☐ I served the sub   | ☐ I served the subpoena by delivering a copy to the named person as follows:   |   |                        |  |  |
|  |  | on (date) ;   | or                     |  |  |
|  | ubpoena unexecuted because:  |   |                        |  |  |
| Unless the subpoe tendered to the win                      | na was issued on behalf of the United tness the fees for one day's attendance. | States, or one of its officers or agents, I, and the mileage allowed by law, in the | have also<br>amount of |  |  |
| \$   | ·  |   |                        |  |  |
| fees are \$  | for travel and \$  | for services, for a total of \$   | 0.00                   |  |  |
|  |  |   |                        |  |  |
| I declare under pe   | nalty of perjury that this information is                                      | s true.   |                        |  |  |
|  |  |   |                        |  |  |
| te:  | _  | Server's signature  |                        |  |  |
|  |  |   |                        |  |  |
|  |  |   |                        |  |  |
|  |  | Printed name and title  |                        |  |  |
|  |  | Printed name and title  |                        |  |  |

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

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- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
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# (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between Heidelberg University, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Heidelberg University on April 10, 2024 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from the University of Cincinnati, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Heidelberg University on April 10, 2024 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Heidelberg University on April 10, 2024 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with Heidelberg University on April 10, 2024 or at any time on or after January 1, 2022.

| UNITED STATES DIS   | TRICT COURT  |
|---|--|
| for the   | _  |
| Southern District of  | Ohio   |
| Richard Horton  | Civil Action No. 2:23-cv-3888                            |
| SUBPOENA TO PRODUCE DOCUMENTS<br>OR TO PERMIT INSPECTION OF PRE   | , INFORMATION, OR OBJECTS<br>EMISES IN A CIVIL ACTION    |
| To: The Ohio State University, Office of Legal Affairs, 1590 N. H (Name of person to whom this  |  |
| Production: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to produce at the documents are documents.  See Exhibit A   | ne time, date, and place set forth below the following   |
| Place: City of Columbus, Dept. of Law 77 N. Front Street, Columbus, OH 43215  | Date and Time: 09/06/2024 at 9:00 a.m.                   |
| ☐ Inspection of Premises: YOU ARE COMMANDED to pother property possessed or controlled by you at the time, date, armay inspect, measure, survey, photograph, test, or sample the pro-                             | d location set forth below, so that the requesting party |
| Place:  | Date and Time:   |
| The following provisions of Fed. R. Civ. P. 45 are attach Rule 45(d), relating to your protection as a person subject to a sul respond to this subpoena and the potential consequences of not d. Date: 08/19/2024 | ppoena; and Rule 45(e) and (g), relating to your duty to |
| CLERK OF COURT  | OR Sal Sin   |
| Signature of Clerk or Deputy Clerk  | Attorney's signature                                     |
| The name, address, e-mail address, and telephone number of the  | attorney representing (name of party)                    |
| Brenda Walker and City of Columbus  David Dirisamer, Assistant City Attorney, 77 N. Front Street, Columbus  | , who issues or requests this subpoena, are:             |

Notice to the person who issues or requests this subpoena

614-645-6964

Civil Action No. 2:23-cv-3888

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

|  | I received this subpoena for (name of individual and title, if any)          |                   |                      |                                 |      |  |
|--|--|-------------------|----------------------|---------------------------------|------|--|
| on (date,  |  |                   |                      |                                 |      |  |
|  | ☐ I served the subpoena by delivering a copy to the named person as follows: |                   |                      |                                 |      |  |
| on (date) ; 0  |  |                   |                      |                                 |      |  |
|  | ☐ I returned the subpoena  |                   | 211001               |                                 |      |  |
| Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I leadered to the witness the fees for one day's attendance, and the mileage allowed by law, in the |  |                   |                      |                                 |      |  |
|  | \$   | <u> </u>          |                      |                                 |      |  |
| My fee   | es are \$  | for travel ar     | nd \$                | for services, for a total of \$ | 0.00 |  |
|  | I declare under penalty of   | perjury that this | information is true. |                                 | ,    |  |
| Date:  |  | _                 |                      | Server's signature              |      |  |
|  |  | _                 |                      | Printed name and title          |      |  |
|  |  |                   |                      | Server's address                |      |  |
|  |  |                   |                      | Server's address                |      |  |

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

# (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

# (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

# Exhibit A

Pursuant to the attached subpoena and Fed. R. Civ. P. 45, please produce the following:

All contracts or agreements between the Ohio State University, or any agent or division thereof, and Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Ohio State University on March 27, 2024 or September 20, 2023 or at any time on or after January 1, 2022.

All payments, reimbursements, or other remuneration from the Ohio State University, or any agent or division thereof, to Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Ohio State University on March 27, 2024 or September 20, 2023 or at any time on or after January 1, 2022.

All videos, recordings, or transcripts regarding statements made by Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Ohio State University on March 27, 2024 or September 20, 2023 or at any time on or after January 1, 2022.

All documents reflecting all communications (either written or oral) with Richard Horton or Janette Horton or Pierce Reed or the Ohio Innocence Project in relation to Richard Horton, regarding events to be held at or in conjunction with the Ohio State University on March 27, 2024 or September 20, 2023 or at any time on or after January 1, 2022.